

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

UNITED STATES OF AMERICA

v.

JESUS GERARDO LEDEZMA-CEPEDA (1)

JESUS GERARDO LEDEZMA-CAMPANO (2)

JOSE LUIS CEPEDA-CORTES (3)

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NO. 4:14-CR-0151-Y

DEFENDANT JOSE LUIS CEPEDA-CORTES'S NOTICE OF EXPERT DESIGNATION

The Defendant JOSE LUIS CEPEDA-CORTES files this his designation of expert witnesses pursuant to the Court's order. The Defendant intends to call:

1. Maria Cruz Ochoa, Customs and Border Protection Officer

This witness will testify regarding border crossings of the defendants.

2. Officer B.W. Randolph, Fort Worth Police Department

This witness will testify regarding the forensic examination of cellular phones seized as part of the investigation.

3. Special Agent Refugio Hernandez, Homeland Security Investigations

This witness will testify regarding law enforcement actions taken in the investigation of the murder of J.J.G.C.

4. Cooperating Witness

This witness will testify regarding the language used among drug traffickers.

5. Lizette Arrocho Stephens, FBI Translator

This witness will testify regarding the translation of Spanish language document into English.

6. Clark Swanson, Blackline GPS

This witness will testify regarding the technology in the trackers used in this conspiracy and the data recovered from the devices.

7. SA Michael Elsey, FBI

This witness will testify regarding all aspects of the investigation and will utilize his expertise in the area of law enforcement to address various portions of the conspiracy.

8. SA Gary Koenig, FBI

This witness will testify regarding all aspects of the investigation and will utilize his expertise in the area of law enforcement to address various portions of the conspiracy.

9. SA Yoshi Bodie, FBI

This witness will testify regarding all aspects of the investigation and will utilize her expertise in the area of law enforcement to address various portions of the conspiracy.

10. Jeff Lloyd, DEA Analyst

This witness will testify regarding the use of technology in the conspiracy including, but not limited to, information recovered from cellular records, ISP's and electronic equipment seized from the defendants. He will further testify regarding communication techniques used by members of the conspiracy and used by members of narcotics organizations. Mr. Lloyd may further testify regarding the segregation of responsibilities that occurs within narcotics organizations.

11. Tom Hager, Analyst, USAO

This witness will testify regarding the financial records of the defendants.

12. Dr. Tasha Greenberg, Tarrant County Medical Examiner's Office

This witness will testify regarding the autopsy she performed on J.J.G.C.

13. Officer Karl Moore, Southlake Police Department

This witness will testify regarding all aspects of the investigation and will utilize his expertise in the area of law enforcement to address various portions of the conspiracy.

14. Kazia Crocker, Blackberry Corporation

This witness will testify regarding the technology of Blackberry messaging and records related to the use of Blackberry phones.

15. SA Monica Segedy, FBI

This witness will testify regarding all aspects of the investigation and will utilize her expertise in the area of law enforcement to address various portions of the conspiracy.

16. Aubree Crews, FBI

This witness will testify regarding fingerprint evidence recovered in the investigation.

17. Shane Hoffman, DNA Analyst, FBI

This witness will testify regarding DNA evidence recovered in the investigation.

18. SA Mark Sedwick, FBI Cellular Analysis Survey Team

This witness will testify regarding the locations of trackers and cellular phones during the conspiracy.

19. Thomas Song, Deputy Director, Computer Crime and Intellectual Property Section

This witness will testify regarding the forensic examination of computer equipment and cellular phones seized in the investigation.

20. M. Kline, Crime Scene Investigator, Tarrant County Sheriff's Department

This witness will testify regarding the crime scene investigation done in Southlake Town Square.

21. SA Paul Ramirez, DEA

This witness will testify regarding all aspects of the investigation and will utilize his expertise in the area of law enforcement to address various portions of the conspiracy. This witness will testify regarding Mexican drug trafficking organizations.

22. SA Tony Santos, DEA, Retired

This witness will testify regarding all aspects of the investigation and will utilize his expertise in the area of law enforcement to address various portions of the conspiracy.

23. Cathy Cisco, Southlake Police Department Evidence Custodian

This witness will testify regarding the collection of evidence in this investigation.

24. SA Rodrigo Gonzalez, III, FBI

This witness will testify regarding the manner and means used to recover fingerprints from the victim's vehicle.

25. SA Kenny Radfar, FBI

This witness will testify regarding the manner and means used to recover fingerprints from the victim's vehicle.

26. Jesse Basham, FBI

This witness will testify regarding the handling of electronic evidence in the investigation.

27. SA Lynette Linn, FBI

This witness will testify regarding all aspects of the investigation and will utilize her expertise in the area of law enforcement to address various portions of the conspiracy.

28. SA Paul Huber, DEA

This witness will testify regarding DEA license plate reader technology.

29. SA Todd Emery, DEA

This witness will testify regarding DEA license plate reader technology.

30. Donald J. Whitehead

This witness will testify regarding the Tarrant Appraisal District records.

31. SA Lee Lucas, DEA

This witness will testify regarding Blackberry devices.

32. SA Gannon Hicks, DEA

This witness will testify regarding all aspects of the investigation and will utilize his expertise in the area of law enforcement to address various portions of the conspiracy.

33. Donald Wills, FBI

This witness will testify regarding the handling of electronic evidence in the investigation.

34. Rosa Madrigal

This witness will testify to the usage and meaning of colloquial Spanish language.

35. Sandra McLean

This witness will testify to the usage and meaning of colloquial Spanish language.

36. Joey Cepeda

This witness will testify about surveillance cameras, license plate recognition software and data collection,

37. Al Yonovitz

This witness will testify about the handling of electronic evidence in this case and the authentication and manipulation of video and audio mediums.

38. James Granada, US Border Patrol

This witness will testify about the structure of the organizations J. J. G. C. operated while a U. S. Government informant. He will also testify about the dangers faced by all members of drug cartels as well as informants. He will also testify about the dangers faced by all those associated with the criminal organizations involving J. J. G. C. when J. J. G. C. was informing on specific cartels.

39. DEA SA Anthony R. Santos

This witness will testify as to law enforcement actions, techniques and procedures taken in the use of J. J. G. C. in targeting U.S and Mexican law enforcement activities against Mexican drug trafficking organizations which ultimately resulted in the kidnapping and release of J. J. G. C.'s family based on the agreement that those organizations would no longer be targeted by J. J. G. C. This witness will also testify regarding law enforcement actions, techniques and procedures taken in the use of J. J. G. C. to recover assets from Mexican drug trafficking organizations to the benefit of the United States. This witness will testify regarding law enforcement actions, techniques and procedures taken to determine and respond to individuals that had been determined to have a motive to kill J. J. G. C. This witness will testify regarding Mexican drug trafficking organizations.

40. FBI SA David De Leos Santos

This witness will testify as to law enforcement actions, techniques and procedures taken in the use of J. J. G. C. in targeting U.S and Mexican law enforcement activities against Mexican drug trafficking organizations which ultimately resulted in the kidnapping and release of J. J. G. C.'s family based on the agreement that those organizations would no longer be targeted by J. J. G. C. This witness will also testify regarding law enforcement actions, techniques and procedures taken in the use of J. J. G. C. to recover assets from Mexican drug trafficking organizations to the benefit of the United States. This witness will testify regarding law enforcement actions, techniques and procedures taken to determine and respond to individuals that had been determined to have a motive to kill J. J. G. C. This witness will testify regarding Mexican drug trafficking organizations.

41. Jaime Prada

This witness will testify as to law enforcement actions, techniques and procedures taken in the use of J. J. G. C. in targeting U.S and Mexican law enforcement activities against Mexican drug trafficking organizations which ultimately resulted in the kidnapping and release of J. J. G. C.'s family based on the agreement that those organizations would no longer be targeted by J. J. G. C. This

witness will also testify regarding law enforcement actions, techniques and procedures taken in the use of J. J. G. C. to recover assets from Mexican drug trafficking organizations to the benefit of the United States. This witness will testify regarding law enforcement actions, techniques and procedures taken to determine and respond to individuals that had been determined to have a motive to kill J. J. G. C. This witness will testify regarding Mexican drug trafficking organizations.

42. FBI SA Freddy Vela

This witness will testify as to law enforcement actions, techniques and procedures taken in the use of J. J. G. C. in targeting U.S and Mexican law enforcement activities against Mexican drug trafficking organizations which ultimately resulted in the kidnapping and release of J. J. G. C.'s family based on the agreement that those organizations would no longer be targeted by J. J. G. C. This witness will also testify regarding law enforcement actions, techniques and procedures taken in the use of J. J. G. C. to recover assets from Mexican drug trafficking organizations to the benefit of the United States. This witness will testify regarding law enforcement actions, techniques and procedures taken to determine and respond to individuals that had been determined to have a motive to kill J. J. G. C. This witness will testify regarding Mexican drug trafficking organizations.

43. ICE SA Eddie Almond

This witness will testify as to law enforcement actions, techniques and procedures taken in the use of J. J. G. C. in targeting U.S and Mexican law enforcement activities against Mexican drug trafficking organizations which ultimately resulted in the kidnapping and release of J. J. G. C.'s family based on the agreement that those organizations would no longer be targeted by J. J. G. C. This witness will also testify regarding law enforcement actions, techniques and procedures taken in the use of J. J. G. C. to recover assets from Mexican drug trafficking organizations to the benefit of the United States. This witness will testify regarding law enforcement actions, techniques and procedures taken to determine and respond to individuals that had been determined to have a motive to kill J. J. G. C. This witness will testify regarding Mexican drug trafficking organizations.

44. ICE SA Carlos Fomborn

This witness will testify as to law enforcement actions, techniques and procedures taken in the use of J. J. G. C. in targeting U.S and Mexican law enforcement activities against Mexican drug trafficking organizations which ultimately resulted in the kidnapping and release of J. J. G. C.'s family based on the

agreement that those organizations would no longer be targeted by J. J. G. C. This witness will also testify regarding law enforcement actions, techniques and procedures taken in the use of J. J. G. C. to recover assets from Mexican drug trafficking organizations to the benefit of the United States. This witness will testify regarding law enforcement actions, techniques and procedures taken to determine and respond to individuals that had been determined to have a motive to kill J. J. G. C. This witness will testify regarding Mexican drug trafficking organizations.

45. DEA SA Rick S. Rodriquez

This witness will testify as to law enforcement actions, techniques and procedures taken in the use of J. J. G. C. in targeting U.S and Mexican law enforcement activities against Mexican drug trafficking organizations which ultimately resulted in the kidnapping and release of J. J. G. C.'s family based on the agreement that those organizations would no longer be targeted by J. J. G. C. This witness will also testify regarding law enforcement actions, techniques and procedures taken in the use of J. J. G. C. to recover assets from Mexican drug trafficking organizations to the benefit of the United States. This witness will testify regarding law enforcement actions, techniques and procedures taken to determine and respond to individuals that had been determined to have a motive to kill J. J. G. C. This witness will testify regarding Mexican drug trafficking organizations.

46. DEA IA T. Nicole Hudnall, McAllen District, Office Group 1B1

This witness will testify as to law enforcement actions, techniques and procedures taken in the use of J. J. G. C. in targeting U.S and Mexican law enforcement activities against Mexican drug trafficking organizations which ultimately resulted in the kidnapping and release of J. J. G. C.'s family based on the agreement that those organizations would no longer be targeted by J. J. G. C. This witness will also testify regarding law enforcement actions, techniques and procedures taken in the use of J. J. G. C. to recover assets from Mexican drug trafficking organizations to the benefit of the United States. This witness will testify regarding law enforcement actions, techniques and procedures taken to determine and respond to individuals that had been determined to have a motive to kill J. J. G. C. This witness will testify regarding Mexican drug trafficking organizations.

47. Det. Sean Lease

This witness will testify regarding the use of technology in the conspiracy, including but not limited to, information recovered from cellular records and electronic equipment seized from J. J. G. C. He will further testify regarding

communication techniques used by J. J. G. C. and used by members of narcotics organizations. This witness will testify regarding the segregation of responsibilities that occurs within narcotics organizations.

48. FBI Amy Kenny

This witness will testify regarding the use of technology in the conspiracy, including but not limited to, information recovered from cellular records and electronic equipment seized from J. J. G. C. He will further testify regarding communication techniques used by J. J. G. C. and used by members of narcotics organizations. This witness will testify regarding the segregation of responsibilities that occurs within narcotics organizations.

49. FBI Lauren Ryan

This witness will testify regarding the use of technology in the conspiracy, including but not limited to, information recovered from cellular records and electronic equipment seized from J. J. G. C. He will further testify regarding communication techniques used by J. J. G. C. and used by members of narcotics organizations. This witness will testify regarding the segregation of responsibilities that occurs within narcotics organizations.

50. FBI Castulo Carlos Valez

This witness will testify regarding his investigation into the illegal activities of J. J. G. C. while J. J. G. C. was an informant for the United States of America; the segregation of responsibilities in his drug organization and the means used specifically by his drug operation to avoid interference from law enforcement.

51. FBI Paul H. Wendorg

This witness will testify regarding his investigation into the illegal activities of J. J. G. C. while J. J. G. C. was an informant for the United States of America; the segregation of responsibilities in his drug organization and the means used specifically by his drug operation to avoid interference from law enforcement.

52. DEA SA Ronald Morrison

This witness will testify regarding his investigation into the illegal activities of J. J. G. C. while J. J. G. C. was an informant for the United States of America; the segregation of responsibilities in his drug organization and the means used specifically by his drug operation to avoid interference from law enforcement.

53. DEA Brian Cole

This witness will testify regarding his investigation into the illegal activities of J. J. G. C. while J. J. G. C. was an informant for the United States of America; the segregation of responsibilities in his drug organization and the means used specifically by his drug operation to avoid interference from law enforcement.

54. GS Ferdinand Large

This witness will testify regarding his investigation into the illegal activities of J. J. G. C. while J. J. G. C. was an informant for the United States of America; the segregation of responsibilities in his drug organization and the means used specifically by his drug operation to avoid interference from law enforcement.

55. DEA SA Henry Hill

This witness will testify regarding his investigation into the illegal activities of J. J. G. C. while J. J. G. C. was an informant for the United States of America; the segregation of responsibilities in his drug organization and the means used specifically by his drug operation to avoid interference from law enforcement.

56. DEA Sergio Luna

This witness will testify regarding his investigation into the illegal activities of J. J. G. C. while J. J. G. C. was an informant for the United States of America; the segregation of responsibilities in his drug organization and the means used specifically by his drug operation to avoid interference from law enforcement.

57. DEA SA Ken Niehl

This witness will testify regarding his investigation into the illegal activities of J. J. G. C. while J. J. G. C. was an informant for the United States of America; the segregation of responsibilities in his drug organization and the means used specifically by his drug operation to avoid interference from law enforcement.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J. Stephen Cooper", is written over a horizontal line.

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served by ECF upon all counsel of record for all parties on this the 4th day of March, 2016.

A handwritten signature in black ink, appearing to read "J. Stephen Cooper", is written over a horizontal line.

J. STEPHEN COOPER